UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICAS Plaintiff,

v.

JEFFREY S. FREEMAN

Defendant.

Criminal No. 22-20346

HON. PAUL D. BORMAN

NOTICE OF WITHDRAWAL OF SUBPOENA TO ASHLEY VANN

- 1. On September 22, 2022, this Court authorized Defendant to serve a subpoena on Ashley Vann (the "9/22 Order"). ECF No. 27, PageID.130 at ¶1.
- 2. In the 9/22 Order, the Court found that the speedy trial clock would be stopped while any motions to quash the subpoenas remained pending. PageID.131 at ¶4.
- 3. On September 30, 2022, Defendant's counsel conferred with Ashley Vann's counsel via email. Ms. Vann's counsel explained that there was no room for compromise on the subpoena and that she intended to move to quash all eight requests.
- 4. Ms. Vann thereafter moved to quash the subpoena in its entirety. *In re Subpoena to A.V.*, No. 22-51509 (Sept. 30, 2022).
- 5. Because Defendant objects to any delay of his currently scheduled October 13 trial date, including delay caused by Ms. Vann's motion, he hereby withdraws the subpoena.

6. By withdrawing this subpoena, Defendant reserves all, and does not waive any, rights.

Respectfully submitted,

BUTZEL LONG, P.C.

/s/ George B. Donnini

Dated: October 2, 2022

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